11mted on. 10/0//2019 09.10.07	Printed on:	10/07/2019	09:10:07
--------------------------------	-------------	------------	----------

Application No: Consultees Name: Received: Comment: 2019/3364/P OBJ

09/07/2019 16:31:59

Nick Kocharhook

Response:

This planning application proposes to relocate 156 cycle parking spaces. Unfortunately, it does not describe what technology is proposed to provide the cycle parking in the new locations. If the cycle parking will use the very common Sheffield stand, then the proposed space (a total of 137m2) is far from sufficient for the required level of cycle parking (156 spaces have been consented). The London Cycle Design Standards use an indicative measure of 1.4m2 per bicycle to be stored with Sheffield stands, which would give a rough estimate of 97 spaces. The number available may further shrink when clearance requirements for walls and aisles are taken into account.

The transport CPG has this to say about two-tier racks:

"Whilst two-tier racks are not considered as an appropriate alternative for all cycle parking, as half of the stands require an element of lifting a cycle onto the top rack, consideration will be given to a proportion of the provision being provided as a two-tier rack. This may be appropriate, for example, in a large office redevelopment where there is limited space for step free access."

(pg 56, https://tinyurl.com/yxaxeolk)

I'm not able to locate the original planning permission, so I don't know if the applicant has already received permission for some portion of the proposed cycle parking to be two-tier racks. Regardless, if the bikes are instead going to be put on two-tier racks, then sufficient clearance must be available in front of the racks to easily get bikes on and off the upper tier. Hackney's bicycle parking guidance (https://tinyurl.com/yy8hj78t pg 17) mandates 2.5m of space between a two-tier cycle rack and any obstruction—I'm not sure what Camden's requirements are, or indeed what the manufacturer's recommendation is for any rack the applicant may be planning to sue. But the smaller portion of the large proposed cycle store provides just 2m for the aisle between the two cycle racks, so it may not be sufficient.

Furthermore, Camden's CPG requires that 5% of cycle parking spaces be able to accommodate nonstandard cycles (pg 52). With space required for 156 cycles, this equates to 7.8 accessible cycle parking spaces. None of the spaces proposed are suitable for tricycles, Christianias, box bikes or other nonstandard cycles. (It may, however, be the case that only some of the cycle parking is moving and the required accessible spaces are elsewhere but not shown in the plans.)

CPG requires that the cycle store be within 50m of the outside of the building, but the proposed large cycle store is 22+31=53m from the secure entrance gate.

LCDS says "any door to a cycle parking area should be automated." (LCDS 8.2.1) The planning document makes no mention of automated doors. LCDS recommends doors to the outside which will be used to access cycle parking be 2m wide; the doors to access the D2 store are but 1.45m.

In sum, the proposed cycle storage may not be fit for purpose and certainly violates a number of guidelines and planning requirements. Planning permission should not be given until the applicant has amended the designs to comply with Camden, London Plan and LCDS requirements for long-term cycle storage.